

Remarks

Claims 44-86 are now pending in this application. Claims 1-43 are rejected. Claims 1-43 have been cancelled. Claims 44-86 have been newly added. No new matter has been added. No fees are due for the newly added claims. A Petition for Extension of Time is being filed with this Amendment. It is respectfully submitted that the pending claims define allowable subject matter.

Claims 1-7, 10-14, 16-27, 30-38 and 41-43 have been rejected under 35 U.S.C. § 102(e) as being anticipated by Anthony et al. (U.S. Patent 6,559,769). Claims 1-7, 10-14, 16-27, 30-38 and 41-43 have been cancelled and accordingly Applicants respectfully request that this rejection be withdrawn.

Claims 8-9, 28-29 and 39-40 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Anthony et al. in view of Laumeyer et al. (U.S. Patent 6,453,056). Claims 8-9, 28-29 and 39-40 have been cancelled and accordingly Applicants respectfully request that this rejection be withdrawn.

Claim 15 has been rejected under 35 U.S.C. § 103(a) as being unpatentable over Anthony et al. in view of Loyd et al. (U.S. Patent Application Publication 2002/0154218). Claim 15 has been cancelled and accordingly Applicants respectfully request that this rejection be withdrawn.

Newly added independent claim 44 recites a security system comprising “a portable personal digital assistant (PDA) wirelessly coupled to said object recognition system and said camera, the PDA including at least one data collection device.” Applicants submit that the prior art of record fails to describe or suggest a security system as recited in newly added independent claim 44.

Specifically, Anthony et al. (of record) describes an early warning real-time security system including a local controller apparatus 5 for capturing audio and/or video signals 20 via a plurality of cameras 10 and then uploading these signals in real-time to satellite 30. After being uploaded to satellite 30 via an input stream 20, the corresponding audio video signals are then transmitted via a download stream 25 to a monitoring station or home base 35. The monitoring apparatus 5 comprises activation means 15 to trigger continuous real-time monitoring, uplinking-and-downlinking, and recording, on a manually-activated basis. Continuous real-time monitoring, uplinking-and-downlinking, and recording on an automatic basis or on a periodic basis depending upon the nature of an anticipated or expected series of activities or the like also may be provided (column 5, lines 7-23). The activation, creating digital audio and visual signals, uplinking, downlinking, recording, analysis, and remedial measures, may be assigned preset schedules providing a "hot link" between a locally implemented controller apparatus and a plurality of remote receivers that record and monitor activities and events based upon a sequence of audio video signals and control signals received in real-time. The system may provide transmission of audio visual and control signals by dialing up predetermined phone or Internet (or intranet or extranet) numbers via cell phone or other wireless telecommunications and/or transmission of audio visual signals by beaming up to satellite or GPRS or the like, to access special broadband networks over designated frequencies or the like. The system can even call designated pagers by transmitting digital video and audio signals with GPS data. PDA devices such as embodiments of the Palm Connected Organizer and the RIM Blackberry devices may be used for sending and/or receiving information (column 8, lines 37-59).

In general, the system may be implemented using a home-base personal computer, comprising a desktop, a notebook, a sub-notebook, or a PDA, as well as from a sophisticated regional control center. In one embodiment, the early-warning security system 2 includes a mobile unit 5 having an integrated circuit board 350 with a built-in CPU with concomitant

architecture suited to accommodate embedded and multimedia processing. A plurality of remote, mobile units may continuously "talk-to" a plurality of control centers or the like via appropriate communication links to provide a motion picture describing what is occurring in the real world. Such connectivity may be achieved through a combination of wireless devices and infrastructure including cell phones, microwave phones, personal digital assistants (PDAs) and hand-held computers (Palm, pocket PC, etc.), satellites, and the GPS (column 10, lines 29-44).

Additionally, the system may use biometrics and a reference database to help identify individuals and provide triggers or other notification (column 17, line 59 to column 18, line 21). The system also may be implemented in connection with conventional surveillance systems. For example, in an airline application, a constant video stream from the system may be used in connection with an X-ray machine and hand-operated wands (metal detectors) to provide monitoring and analysis of, for example, a check-in area of an airport (column 18, lines 21-36). Additionally, the streaming video may be used to provide personnel identification *visually* by reconciling video streaming results with facial characteristics and badge identification, and any other biometrics and behavioral information available (column 19, lines 7-17).

Anthony et al. fails to describe or suggest a security system having a PDA wirelessly coupled to an object recognition system and a camera, with the PDA including at least one data collection device. The system of Anthony et al. may include one or more mobile devices, such as a PDA, for communicating with controllers or control centers. This communication may include receiving streaming video or other stored information (e.g., characteristic information relating to individuals). Additionally, information from other devices, for example, an X-ray machine, hand-held wand metal detector or other surveillance/security device may be communicated to the mobile device via the control center. Using this information, an operator

of the mobile device may remotely monitor and analyze an area to determine if any action is needed, for example, preventative or remedial action. However, all the information is received via cameras and other devices not provided as part of the mobile device.

In contrast, the security system recited in claim 44 not only includes a PDA coupled to an object recognition system and a camera, but also includes at least one data collection device. This data collection device allows, for example, for acquiring data independent of the object recognition system and camera. The mobile device of Anthony et al. only allows for receiving information from other devices and using that information for monitoring activities. For example, personnel identification may be provided by comparing badge identification information received from a database and reconciling that information with received streaming video of a badge worn by an individual. In contrast, the security system recited in claim 44 includes a data collection device that allows, for example, for independent acquisition of data to facilitate the monitoring process (e.g., validating security badges with a proximity card detector). The system of Anthony et al. simply does not describe or suggest any data collection device provided in connection with the mobile device.

Further, Laumeyer et al. (of record) describes a method and apparatus for automatically generating a database of road sign images and positions identified from video images depicting roadside scenes that are recorded from a vehicle navigating a road (abstract). Additionally, Loyd et al. (of record) describes an apparatus within a street lamp for remote surveillance and having a directional antenna with a radio receiver remotely controlling a camera and the directional antenna (abstract). Even from a cursory reading of these references, the references fail to make up for the deficiencies of the Anthony et al. reference in not describing or suggesting a security system wherein a data collection device is provided with a PDA that is coupled to an object recognition system and a camera. Accordingly, Applicants submit that claim 44 is patentable over the prior art of record.

Newly added claims 45-64 depend from independent claim 44, which is submitted to be in condition for allowance and patentable over the cited art. When the recitations of claims 45-64 are considered in combination with the recitations of newly added independent claim 44, Applicants submit that dependent claims 45-64 are likewise patentable over the cited art for at least the reasons set forth above.

Newly added independent claim 65 recites a method of providing security information comprising “acquiring non-video data from a data collection device of the PDA.” As discussed in more detail above, although the system of Anthony et al. may acquire non-video data from a database of the system (i.e., communicated from a database to a mobile device), the mobile device simply does not include any means for acquiring non-video data from a data collection device of a PDA. Accordingly, Applicants submit that claim 65 is patentable over the prior art of record.

Newly added claims 66-76 depend from independent claim 65, which is submitted to be in condition for allowance and patentable over the cited art. When the recitations of claims 66-76 are considered in combination with the recitations of newly added independent claim 65, Applicants submit that dependent claims 66-76 are likewise patentable over the cited art for at least the reasons set forth above.

Newly added independent claim 77 recites a method of providing security information comprising “acquiring non-image data from a data collection device of the PDA.” For at least the reasons set forth above with respect to claim 65, claim 77 is likewise patentable over the prior art of record.

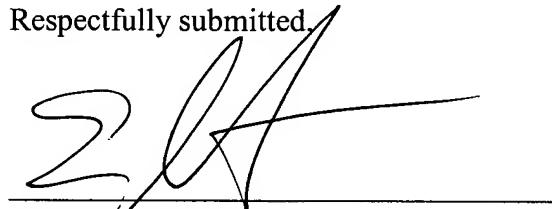
Newly added claims 78-86 depend from independent claim 77, which is submitted to be in condition for allowance and patentable over the cited art. When the recitations of claims 78-86 are considered in combination with the recitations of newly added independent claim 77,

Applicants submit that dependent claims 78-86 are likewise patentable over the cited art for at least the reasons set forth above.

Thus, Applicants respectfully submit that newly added claims 44-86 are patentable over the cited art.

Accordingly, in view of the foregoing, it is respectfully submitted that the prior art fails to teach or suggest the claimed invention and all of the pending claims in this application are believed to be in condition for allowance. Reconsideration and favorable action is respectfully solicited. Should anything remain in order to place the present application in condition for allowance, the Examiner is kindly invited to contact the undersigned at the telephone number listed below.

Respectfully submitted,



Evan Reno Sotiriou
Registration No. 46,247
ARMSTRONG TEASDALE LLP
One Metropolitan Square, Suite 2600
St. Louis, MO 63102-2740
(314) 621-5070